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November 21, 2019

File No. 29133.265

**VIA ECF and FEDEX Overnight**

Hon. Paul E. Davison, U.S.M.J.  
United States District Court, SDNY  
The Hon. Charles L. Brieant Jr.  
Federal Building and  
United States Courthouse  
300 Quarropas Street,  
White Plains, NY 10601-4150

Re: Michael Holness, *et al.*, v. LG Chem Ltd., *et al.*,  
Civil Action No. 7:17-cv-07726(NSR)(PED)  
Defendant LG Chem's Opposition and Cross-Motion

Dear Judge Davison:

This office represents Defendant LG Chem, Ltd., ("LG Chem") in the above-referenced matter. In accordance with this Honorable Court's so-ordered briefing schedule, on November 21, 2019, LG Chem served its opposition to Plaintiffs' motion for sanctions and LG Chem's cross-motion via FedEx Overnight addressed to the Honorable Paul E. Davison, U.S.M.J. ("Opposition and Cross-Motion"). Due to the trade secret and confidential nature of the information at issue, LG Chem served their Opposition and Cross-Motion on this Honorable Court for *in camera* review.

A copy of LG Chem's Opposition and Cross-Motion in response to Plaintiffs' motion for sanctions was also served on all counsel of record via FedEx and email pursuant to the terms of the June 18, 2018, so-ordered Confidentiality Order in effect in this case.

Thank you for Your Honor's time and consideration with regard to this issue.

Respectfully,

/s/ Troy P. Cunningham

Troy P. Cunningham for  
LEWIS BRISBOIS BISGAARD & SMITH LLP

TPC

cc: All Counsel of Record (via ECF)